

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
BALTIMORE DIVISION

IN RE:
CHRISTOPHER RAY ROBINSON

BCN#: 24-18493
Chapter: 13

Debtor

DEUTSCHE BANK NATIONAL TRUST
COMPANY as Trustee for INDYMAC
INDX MORTGAGE LOAN TRUST 2006-
AR29, MORTGAGE PASS-THROUGH
CERTIFICATES Series 2006-AR29

MOTION FOR ORDER GRANTING
RELIEF FROM AUTOMATIC STAY

or present noteholder,
Movant/Secured Creditor,

v.
CHRISTOPHER RAY ROBINSON
Debtor

and
REBECCA A. HERR, CHAPTER 13
TRUSTEE
Trustee
Respondents

COMES NOW, DEUTSCHE BANK NATIONAL TRUST COMPANY AS TRUSTEE
FOR INDYMAC INDX MORTGAGE LOAN TRUST 2006-AR29, MORTGAGE PASS-
THROUGH CERTIFICATES SERIES 2006-AR29, its assignee and/or successors in interest,
(Movant herein), by Counsel, and alleges as follows:

1. The above-named Debtor filed a Chapter 13 Petition in Bankruptcy with this Court on October 9, 2024.
2. The bankruptcy court has jurisdiction over this proceeding pursuant to 28 U.S.C. §§ 157 and 1334, and 11 U.S.C. § 362; Federal Rule of Bankruptcy Procedure 9014. This matter is a core proceeding.
3. The Movant is the current payee of a promissory note secured by a deed of trust upon a parcel of real property with the address of 1610 Kings View Dr, Bel Air, MD 21015 and

more particularly described in the Deed of Trust dated August 30, 2006 and recorded at Liber 7056 at Folio 0187, among the land records of the County of Harford as:

BEING KNOWN AND DESIGNATED as Lot 56, as shown on a plat entitle "FINAL PLAT 2-SECTION FOUR, TODD LAKES", which Plat is recorded among the Land Records of HARFORD COUNTY, Maryland in Plat Book CGH 75, folio 4. The improvements thereon being known as 1610 KINGS VIEW DRIVE.

Copies of the Deed of Trust and Note are attached hereto and made a part hereof by reference.

4. This Movant is informed and believes, and based upon such information and belief, alleges that title to the subject Property is currently vested in the name of the Debtor.

5. The approximate total debt figure, as of January 17, 2025 is \$518,611.74 (not to be relied upon as the payoff amount). It consists of the following:

- a. Principal Balance: \$402,769.04
- b. Interest: \$78,402.22
- c. Escrow Advance: \$23,533.31
- d. Accumulated Late Fees: \$1,380.34
- e. Recoverable Balance: \$13,548.59
- f. Trustee Suspense: (\$1,021.96)

6. Movant filed a Proof of Claim which provides a detailed statement of the debt owed, a copy of which is a part of the Court's record, and is incorporated herein and made a part of this Motion for Relief.

7. The Debtor is in default with regard to payments which have become due under the terms of the aforementioned Note and Deed of Trust since the filing of the Chapter 13 Petition.

As of January 17, 2025 the Debtor is due for:

- o 3 post petition monthly payments of \$4,274.88 each which were to be paid directly to the Movant and which represents the minimum payment;

- o In addition to the post-petition default listed above PHH Mortgage Corporation has also incurred additional fees for drafting and filing the Motion for Relief in the amounts of \$1,350.00 and \$199.00 and those are also now due.

8. The Movant has elected to initiate foreclosure proceedings on the Property with respect to the subject Trust Deed but is prevented by the Automatic Stay from going forward with these proceedings.

9. This Movant is informed and believes, and based upon such information and belief, alleges that absent this Court's Order allowing this Movant to proceed with the pending foreclosure, Movant's security interest will be significantly jeopardized and/or destroyed.

10. That Rebecca A. Herr, Chapter 13 Trustee, Trustee, has been appointed by this Court as the Chapter 13 Trustee in this instant Bankruptcy proceeding.

WHEREFORE, the Movant prays for an Order Granting Relief From the Automatic Stay of 11 U.S.C. § 362(a), and for costs of suit and disbursements of this contested matter, including reasonable attorney's fees, and, for such other relief as the court may deem to be proper.

Dated: 2/6/2025

LOGS LEGAL GROUP LLP
Attorney for Movant

/s/Randa S Azzam

By: _____
William M. Savage, Esquire
Federal I.D. Bar No. 06335
Randa Azzam, Esquire
Federal I.D. Bar No. 22474
Gregory N. Britto, Esquire
Federal I.D. Bar No. 22531
Angela M. Tonello, Esquire
Federal I.D. Bar No. 30084

Counsel for Movant

LAW OFFICES OF LOGS LEGAL GROUP LLP

Mailing Address

10130 Perimeter Parkway, Suite 400

Charlotte, North Carolina 28216

(703) 449-5800 / logsecf@logs.com / 23-293551

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of February, 2025, the following person(s) were served a copy of the foregoing in the manner described below:

Via CM/ECF Electronic Notice:

S.D. Raysor-Taylor, Raysor-Taylor Law, P.A.
The Belvedere Executive Suites
One East Chase Street, Suite 206
Baltimore, MD 21202
raysorlawofc@aol.com

Debtor's Attorney

Rebecca A. Herr
185 Admiral Cochrane Drive, Suite 240
Annapolis, MD 21401
ecf@ch13md.com

Chapter 13 Trustee

Via First Class Mail, Postage Prepaid:

Christopher Ray Robinson
1610 Kings View Drive
Bel Air, MD 21015

Debtor(s)

/s/Randa S Azzam

William M. Savage, Esquire
Federal I.D. Bar No. 06335
Randa Azzam, Esquire
Federal I.D. Bar No. 22474
Gregory N. Britto, Esquire
Federal I.D. Bar No. 22531
Angela M. Tonello, Esquire
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NOTICE OF MOTION FOR RELIEF FROM STAY
AND HEARING THEREON

DEUTSCHE BANK NATIONAL TRUST COMPANY AS TRUSTEE FOR INDYMAC
INDX MORTGAGE LOAN TRUST 2006-AR29, MORTGAGE PASS-THROUGH
CERTIFICATES SERIES 2006-AR29, and its assignees (Movant herein) by counsel, has filed
papers with the Court seeking relief from the automatic stay of 11 U.S.C. § 362 (a) to enable it to
obtain an order granting relief from the automatic stay. Your rights may be affected. You should
read these papers carefully and discuss them with your lawyer, if you have one in this
bankruptcy case. (If you do not have a lawyer, you may wish to consult one.)

If you do not want the court to grant the motion for relief from stay, or if you want the c
ourt to consider your views on the motion, then by February 20, 2024, you or your lawyer must
file a written response with the Clerk of the Bankruptcy Court explaining your position and mail
a copy to:

LOGS LEGAL GROUP LLP, counsel for DEUTSCHE BANK NATIONAL TRUST
COMPANY AS TRUSTEE FOR INDYMAC INDX MORTGAGE LOAN TRUST
2006-AR29, MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2006-AR29

Mailing Address

10130 Perimeter Parkway, Suite 400
Charlotte, North Carolina 28216

If you mail rather than deliver, your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the Court will receive it by the date stated above.

The hearing is scheduled for March 6, 2025 at 10:00am, in Courtroom 9-C, United States Bankruptcy Court, District of Maryland, 101 W. LOMBARD STREET, BALTIMORE, MD 21201.

IF YOU OR YOUR LAWYER DO NOT TAKE THESE STEPS BY THE DEADLINE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT OR OTHERWISE DISPOSE OF THE MOTION BEFORE THE SCHEDULED HEARING DATE.

DATE: 2/6/2025

/s/Randa S Azzam

William M. Savage, Esquire
Federal I.D. Bar No. 06335
Randa Azzam, Esquire
Federal I.D. Bar No. 22474
Gregory N. Britto, Esquire
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LAW OFFICES OF LOGS LEGAL GROUP LLP
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S.D. Raysor-Taylor, Raysor-Taylor Law, P.A.
The Belvedere Executive Suites
One East Chase Street, Suite 206
Baltimore, MD 21202
raysorlawofc@aol.com

Debtor's Attorney

Rebecca A. Herr
185 Admiral Cochrane Drive, Suite 240
Annapolis, MD 21401
ecf@ch13md.com

Chapter 13 Trustee

Via First Class Mail, Postage Prepaid:

Christopher Ray Robinson
1610 Kings View Drive
Bel Air, MD 21015

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